

FILED LUCAS COUNTY  
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COMMON PLEAS COURT  
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IN THE COURT OF COMMON PLEAS OF LUCAS COUNTY, OHIO

**Deborah Trumbull**  
1341 South Berkey-Southern  
Swanton, OH 43558

and

**Richard Trumbull**  
1341 South Berkey-Southern  
Swanton, OH 43558

Plaintiffs,

vs.

**Jack Cooper Transport Company, Inc.**  
c/o Corporation Service Company  
50 West Broad Street, Suite 1330  
Columbus, OH 43215

and

**Carlee Trista Taylor**  
3006 Springtime  
Louisville, KY 40212

and

**Ohio Bureau of Workers' Compensation** \*  
30 West Spring Street  
Columbus, OH 43215-2256

Defendants.

\*  
\* Case No. **G-4801-CI-0202102547-000**  
\* Judge  
\* **JOSEPH V. MCNAMARA**

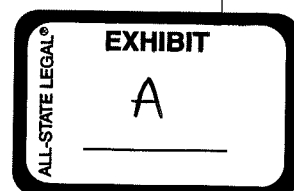
\* Assigned

\*  
\* **COMPLAINT**  
\*

\* **(Jury Demand Endorsed Hereon)**

\*  
\* Charles V. Contrada, Esq. (0012238)  
\* **CONTRADA & ASSOCIATES**  
\* Attorney for Plaintiffs  
\* 6641 Sylvania Avenue, Suite 8  
\* Sylvania, Ohio 43560-3921  
\* PH: (419) 841-4400  
\* FAX: (419) 841-4463  
\* E-MAIL: [charlie@contrada.net](mailto:charlie@contrada.net)

\* \* \* \* \*



Plaintiffs, Deborah Trumbull and Richard Trumbull, by and through their attorney Charles V. Contrada, for their complaint against the above-named Defendants, jointly, severally, or in the alternative, state and aver as follows:

**FIRST CLAIM FOR RELIEF**

1. On or about October 8, 2019, Plaintiff Deborah Trumbull was lawfully operating a Sylvania school bus in a westerly direction on Monroe Street in Sylvania, Lucas County, Ohio.

2. At said time and place, Defendant Carlee Trista Taylor negligently and negligently *per se* operated her vehicle into Plaintiff's vehicle.

3. As a direct and proximate result of Defendant Carlee Trista Taylor's negligence, Plaintiff sustained personal injuries and physical and mental pain and suffering. Said injuries, pain and suffering are expected to continue indefinitely into the future.

4. As a direct and proximate result of Defendant Carlee Trista Taylor's negligence, Plaintiff has incurred medical expenses, which expenses are expected to continue indefinitely into the future.

5. Plaintiff, Deborah Trumbull, has incurred lost wages in connection with her injuries and a diminution of earning capacity and said lost wages and diminution of earning capacity will continue indefinitely into the future.

**SECOND CLAIM FOR RELIEF**

6. Plaintiffs incorporate herein all averments above as if fully rewritten herein.

7. Plaintiff Richard Trumbull is and at all relevant times was the husband of Deborah Trumbull.

8. As a direct and proximate result of the tortious conduct of Defendant, Plaintiff, Richard Trumbull, has been denied his spouse's love, care, services, consortium, and companionship, and will be so deprived indefinitely into the future.

### **THIRD CLAIM FOR RELIEF**

9. Plaintiffs incorporate herein all averments above as if fully rewritten herein.

10. Defendant, Ohio Bureau of Workers' Compensation, is a state agency obligated to pay medical expenses and other benefits to workers injured in the course and scope of their employment.

11. Plaintiff, Deborah Trumbull, was injured in the course and scope of her employment for Sylvania Schools at the time of her injury, described in the First Claim for Relief.

12. Defendant, Ohio Bureau of Workers' Compensation, paid all or some of Plaintiff Deborah Trumbull's injury-related medical expenses, as well as other benefits related to the injury described in the First Claim for Relief.

13. Defendant, Ohio Bureau of Workers' Compensation, claims a statutory right of subrogation/reimbursement pursuant to O.R.C. Section 4123.931 for benefits paid on behalf of Plaintiff related to the incidents described in the First Claim for Relief.

14. Plaintiff, Deborah Trumbull's claims remain open with Ohio Bureau of Workers' Compensation as further benefits are considered.

**WHEREFORE**, Plaintiffs Deborah Trumbull and Richard Trumbull, by and through their attorney Charles V. Contrada, demand judgment against Defendants Jack Cooper Transport Company, Inc., Carlee Trista Taylor and/or Ohio Bureau of Workers' Compensation, for compensatory damages of more than Twenty-Five Thousand Dollars

(\$25,000.00). Further, Plaintiffs, by and through their attorney Charles V. Contrada, demand pre-judgment and post-judgment interest at the rate of ten percent per annum, court costs and such other relief as this Court deems just and equitable.

Respectfully submitted,

CONTRADA & ASSOCIATES

By: /s/Charles V. Contrada  
Charles V. Contrada (0012238)  
Attorney for Plaintiffs

**JURY DEMAND**

Plaintiffs hereby demand a trial by a jury of eight persons on all issues.

/s/Charles V. Contrada  
Charles V. Contrada (0012238)  
Attorney for Plaintiffs